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OUR FILE NO.
727955-142052

September 16, 1996

**VIA CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

Alva E. Smith
FEDERAL ELECTION COMMISSION
Washington, D.C. 20463

Re: MUR 4428

Dear Ms. Smith:

This firm represents the San Diego Convention & Visitors Bureau ("ConVis") in the above-referenced matter. I enclose with this letter an executed Statement of Designation of Counsel to that effect. Please consider this letter as a response to the complaint filed in this matter by the Democratic National Committee.

We note at the outset that the complaint filed by the Democratic National Committee was filed on August 2, 1996 (well before any of the purported transactions were to have taken place) and were based largely upon newspaper accounts of the proposed transactions. We are unaware of any Democratic National Committee official who contacted or attempted to contact ConVis to determine the nature of any such arrangement.

ConVis was contemplating a transaction whereby it could further showcase San Diego as a future convention site through television of the Republican National Convention. Indeed, ConVis had received a legal opinion from an expert on federal election law that the proposed arrangement was lawful. Nonetheless, the issues raised by the Democratic National Committee are moot, since the contemplated transaction never occurred. Enclosed are three pieces of correspondence which reflect the agreement by the Republican National Committee to pay for any television coverage of the convention, the request for refund of the media payment made to National Media, Inc. and the return of the donation made by Amway in that regard.

SEP 20 12 02 PM '96
FEDERAL ELECTION
COMMISSION
OFFICE OF THE CLERK

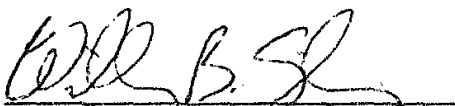
GRAY CARY WARE & FREIDENRICH

Alva E. Smith
September 16, 1996
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I hope that this addresses any concerns that the Commission might have in this matter. Of course, if you have any questions, or would like any further information, please do not hesitate to contact me.

Very truly yours,

GRAY CARY WARE & FREIDENRICH
A Professional Corporation

By: 
William B. Sailer

WBS:bs

STATEMENT OF DESIGNATION OF COUNSEL

MUR 4428

NAME OF COUNSEL: William B. Sailer

FIRM: Gray Cary Ware & Freidenrich

ADDRESS: 4365 Executive Drive, Suite 1600

San Diego, CA 92121

TELEPHONE: (619) 677-1498

FAX: (619) 677-1472

The above-named individual is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

9/11/96
Date

William B. Sailer
Signature

RESPONDENT'S NAME: San Diego Convention & Visitors Bureau

ADDRESS: 401 B Street, Suite 1400

San Diego, CA 92101

TELEPHONE: HOME() N/A

BUSINESS(619) 232-3101

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RECEIVED
FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL COUNSEL

44280-156-11-06



San Diego Convention & Visitors Bureau

401 B Street, Suite 1400, San Diego, CA 92101-4237, Telephone (619) 232-3101, Fax (619) 696-9371

August 9, 1996

Mr. Robin Roberts
President
National Media, Inc.
211 North Union Street, Suite 200
Alexandria, Virginia 22314

Dear Mr. Roberts:

Because the Republican National Convention will broadcast its own convention coverage without commercial interruption, the San Diego Convention & Visitors Bureau ("CONVIS") will not pursue its media promotion of the City of San Diego during the 1996 Republican National Convention on the Family Channel.

As a result, CONVIS requests that you refund our media payment as soon as possible.

We regret any inconvenience this may have caused.

Sincerely,

H. L. Bert James
Chairman of the Board

HLBJ/bmn
cc: Reint Reinders

NATLMEDIA

bcc: Michael Grebe





San Diego Convention & Visitors Bureau

401 B Street, Suite 1400, San Diego, CA 92101-4237, Telephone (619) 232-3101, Fax (619) 696-9371

August 9, 1996

Mr. Richard De Vos
President
Amway Corporation
7575 East Fulton
Ada, Michigan 49355

Dear Mr. De Vos:

The Republican National Convention has decided to broadcast its own convention coverage without any commercial interruption. As a result, the San Diego Convention and Visitors Bureau will not pursue its media promotion of the City of San Diego during the 1996 Republican National Convention coverage on the Family Channel.

Since our San Diego media promotion will not occur, we are returning your donation unless you advise us otherwise.

Although our media plan was not implemented, we appreciate the confidence and support you have shown for our promotional effort.

Sincerely,

A handwritten signature in black ink, appearing to read "H. L. Best James".

H. L. Best James
Chairman of the Board

HLBJ/bmn
cc: Reint Reinders

AMWAY

bcc: Michael Grebe





San Diego Convention & Visitors Bureau

401 B Street, Suite 1400, San Diego, CA 92101-4237, Telephone (619) 232-3101, Fax (619) 696-9371

August 13, 1996

Mr. Michael Grebe
Chairman
Committee on Arrangements
Republican National Committee
750 B St., 14th Floor
San Diego, CA 92101

Dear Mike:

Please accept my sincere thanks for the gracious manner in which you handled the resolution of the broadcast coverage of the Republican National Convention. Your voluntary agreement to pay for televising the convention yourselves avoided any controversy, even though the issue had been deemed legal by both our local council and specialized FEC council based in Washington. You were sensitive to our needs and you deserve high praise for the thoughtful manner in which you considered the interests of all parties, including that of Amway during this process.

Mike, we wish you much success from this week's exciting activities. As an industry, we are very grateful to you and the GOP for bringing the convention here and showcasing our beloved city to the world. You have our respect and appreciation for all you have done for us.

Sincerely,

H.L. Bert James
Chairman of the Board

HLJ/lw

cc Mr. Haley Barbour, Chairman, Republican National Committee
Mr. Dick DeVos, President, Amway Corporation
bcc Mr. Bill Greener, Convention Manager
Mr. Fred Sainz, Deputy Assistant Convention Manager



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